

**AFFIDAVIT OF SPECIAL AGENT TIMOTHY TABER IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Timothy Taber, being duly sworn, hereby depose and state as follows:

**Agent Background**

1. I am a Special Agent (“SA”) with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), and have been so employed since May 2018. I received formal training in conducting criminal investigations at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to becoming an SA with HSI, I was employed as an Intelligence Analyst with the Federal Bureau of Investigation for approximately ten years. In 2005, I graduated from Northeastern University in Boston, Massachusetts with a bachelor’s degree in Criminal Justice. In 2006, I graduated from Suffolk University in Boston, Massachusetts with a master’s degree in Criminal Justice.

2. I am currently assigned to the HSI Boston, Massachusetts Document and Benefit Fraud Task Force (“DBFTF”), a specialized field investigative group comprised of law enforcement personnel from federal, state, and local agencies with expertise in detecting, deterring and disrupting organizations and individuals involved in various types of document, identity, and benefit fraud schemes. As a member of DBFTF, I am responsible for conducting investigations involving but not limited to the manufacturing, counterfeiting, alteration, sale, and use of identity documents and other fraudulent documents to evade immigration laws or for other criminal activity. Due to my training and experience, as well as through conversations with other law enforcement officers, I am familiar with the methods, routines, and practices of document counterfeiters, vendors, and persons who fraudulently obtain or assume false identities.

3. DBFTF is currently investigating suspected aliens who are believed to have obtained stolen identities of United States citizens living in Puerto Rico, and who have used those identities to obtain public benefits that they would not otherwise be eligible to receive, including Massachusetts Registry of Motor Vehicles (“RMV”) identity documents, Social Security Numbers (“SSN”), MassHealth benefits, public housing benefits, and unemployment benefits.

**Purpose of Affidavit**

4. I submit this affidavit in support of an application for a search warrant for the following property: 21 Bunkerhill Street, first floor apartment, Lawrence, Massachusetts 01841 (the “Target Location”), as described in Attachment A. This is the residential address of MANUEL MARIA GERMAN FAMILIA (“GERMAN FAMILIA”), DOB xx-xx-1990, who is the subject of an ongoing federal investigation. On January 28, 2021, GERMAN FAMILIA was indicted by a federal Grand Jury sitting in Boston, Massachusetts for the following offenses: False Representation of Social Security Number, in violation of 42 U.S.C. § 408(a)(7)(B), and Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A (the “Target Offenses”). This Court sealed the indictment under Criminal Number 21-10034-PBS and issued an arrest warrant for GERMAN FAMILIA. I have probable cause to believe that the Target Location contains evidence, fruits, and instrumentalities of the Target Offenses, as further described in Attachment B.

5. The facts in this affidavit come from my personal involvement in this investigation, including interviews of witnesses, the review of documents and records, and conversations with, and information provided to me by, other members of law enforcement. In submitting this affidavit, I have not included every fact known to me about this investigation. Instead, I have only

included facts that I believe are sufficient to establish probable cause for the requested search warrant.

**Probable Cause that GERMAN FAMILIA Committed the Target Offenses**

**The RMV Application**

6. On or about February 18, 2016,<sup>1</sup> a man appeared in person at the RMV office in Haverhill, Massachusetts and submitted a written application to renew his driver's license. On the application, the applicant represented himself as J.E.C.<sup>2</sup> with the date of birth, xx-xx-1989, and SSN xxx-xx-5651. The RMV took a photograph of the applicant as part of the driver's license renewal application. The individual purporting to be J.E.C. signed the application under penalty of perjury. As a result of that application, the RMV issued the person purporting to be J.E.C. a new Massachusetts driver's license bearing number Sxxxx3475 and the photograph captured on February 18, 2016.

7. I have reviewed the RMV file associated with driver's license number Sxxxx3475, in the name of J.E.C. The RMV records include two identification documents that were submitted by the applicant in support of prior applications: (a) an apparent SSN card issued by the Social Security Administration bearing the name J.E.C.F. and SSN xxx-xx-5651; and (b) an apparent certificate of birth from the Puerto Rico Department of Health bearing the name J.E.C.F. and date of birth xx-xx-1989. Notably, on the February 18, 2016 RMV application, the person purporting to be J.E.C. represented that he was a United States citizen.

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<sup>1</sup> The application itself does not contain a date. The RMV's practice at the time of the application was to electronically scan and store all paper applications at or about the time of the application was submitted. At my request, the RMV searched its systems and identified a forensic date stamp associated with the scanning of the application in question. The RMV records indicate that the application was scanned by a clerk on or about February 18, 2016.

<sup>2</sup> The identity of victim J.E.C. is known to the government. In order, these initials represent the victim's first name, middle name, and paternal last name. To protect the victim's privacy, only the initials "J.E.C." and "J.E.C.F." are used in this affidavit to reflect the variations of the victim's full name.

### **Confirmation of Valid Social Security Number and Identification of the Victim**

8. The Social Security Administration, Office of Inspector General confirmed that social security number xxx-xx-5651 is assigned to J.E.C.F.

9. With the assistance of the Puerto Rico Police Department, I obtained a record of the Puerto Rico's Driver and Vehicle Information Database ("DAVID") associated with the driver's license of J.E.C. The record indicates that J.E.C. has the date of birth, xx-xx-1989, and SSN xxx-xx-5651. The record also contains a photograph of a man whom I believe to be the real J.E.C. I have compared the image in the DAVID record and the image of the man photographed at the time of the application described in Paragraph 6, and I conclude that the persons depicted are not the same.

### **Identification of the Imposter**

10. The Dominican Republic has a national identification card which is called a Cedula. HSI queried the Cedula database and identified Cedula Number xxx-xxxxx25-4 bearing the name MANUEL MARIA GERMAN FAMILIA with the date of birth, xx-xx-1990. GERMAN FAMILIA's Cedula included a photograph, fingerprint impressions, and the names of his mother and father.

11. On February 23, 2016, officers of the Haverhill Police Department in Haverhill, Massachusetts arrested a man purporting to be J.E.C. on violations of local criminal laws, including charges related to trafficking in controlled substances and conspiracy to violate drug laws. In accordance with the Haverhill Police Department's booking procedures, officers took fingerprint impressions and a photograph of the man purporting to be J.E.C.

12. The fingerprint impressions from GERMAN FAMILIA's Cedula and the fingerprint impressions obtained by the Haverhill Police Department during the booking of J.E.C.

on February 23, 2016, were sent to the HSI Forensics Laboratory for analysis. The HSI Forensics Laboratory determined that these fingerprint impressions belonged to the same person.

13. I have compared the following three photographs: (a) the February 18, 2016 photograph from the RMV database of the applicant purporting to be J.E.C., referenced in Paragraph 6; (b) the photograph from GERMAN FAMILIA's Cedula Number xxx-xxxxx25-4, referenced in paragraph 10; and (c) the February 23, 2016 photograph preserved by the Haverhill Police Department in the arrest record of the man purporting to be J.E.C., referenced in Paragraph 11. I conclude that these three photographs all appear to depict the same person.

**Probable Cause That Evidence, Fruits, and Instrumentalities of the  
Target Offenses Will Be Found at the Target Location**

14. According to GERMAN FAMILIA's Cedula, his father's name is Angel Manuel German ("Manuel German"). Records on file at the U.S. Department of State indicate that on or about November 9, 2016, Manuel German submitted a United States visa application listing Kiara Sanchez ("Sanchez"), of 21 Bunkerhill Street, Lawrence, Massachusetts, as his United States contact. In the course of my investigation, I discovered that Sanchez and GERMAN FAMILIA have a child together.

15. A search of commercial database records showed that an individual using the name "Rafi Familia" is currently residing at 21 Bunkerhill Street, Lawrence, Massachusetts. In my training and experience, commercial databases utilized by law enforcement to identify a person's residence are often accurate. The commercial database companies obtain their information either by going directly to the source or by purchasing these records from third parties, and present them to end users via an online, web-based interface.

16. The name "Rafi Familia" is familiar to me from my investigation. I learned that on or about November 2, 2018, officers of the Billerica Police Department interviewed a source of

information in a fraud investigation involving GERMAN FAMILIA. The source identified GERMAN FAMILIA by the name “Raff,” and informed the officers that he did not believe it to be GERMAN FAMILIA’s true name. The source also provided police with the name of Facebook profile that he suspected belonged to GERMAN FAMILIA, “Malukito Oo.” A review of the “Malukito Oo” Facebook profile revealed multiple photographs of GERMAN FAMILIA. I submit that the referenced source is reliable, based on corroboration by the social media profile he linked to GERMAN FAMILIA, and GERMAN FAMILIA’s use of the “Raffy Familia” alias as described in Paragraph 18, *infra*.

17. On January 4, 2021, the U.S. Postal Service Inspection Service confirmed that an individual named “Raffy Familia” has been receiving packages at 21 Bunkerhill Street, Lawrence, Massachusetts between October 20, 2020 and January 14, 2021.

18. On January 14, 2021, federal agents conducted a postal ruse at the Target Location with a package addressed to “Raffy Familia.” During the ruse, the U.S. Postal Inspector who was familiar with GERMAN FAMILIA’s appearance encountered an individual outside of the Target Location who identified himself as the second floor resident. He informed the Postal Inspector that “Raffy” lived on the first floor. They entered the unlocked front door of 21 Bunkerhill Street together. The Postal Inspector observed one interior door for the first floor apartment on the left, and stairs to the second floor on the right. The second floor resident knocked on the door to the left, but no one answered. No other doors were visible on the first floor. The Postal Inspector returned later the same day and again attempted to deliver the package to the first floor apartment. This time, GERMAN FAMILIA answered the door. He was not wearing a mask, and the Postal Inspector made a positive identification while delivering the package.

19. I know, based on my training and experience, that:

- a. Individuals often keep identification documents and financial records and other evidence of identity for long periods – sometimes years – and tend to retain such documents even when they depart a given residence. Such documents include driver's licenses, social security cards, bank cards, credit cards, bank records, and credit card statements;
- b. Individuals often keep identification documents and financial records in their residence, in part to ensure the security of these documents and in part to allow for access to these documents when needed;
- c. In addition, it is common for those who use other persons' identities without authorization to maintain fraudulently obtained identification documents in secure locations within their residence to conceal them from law enforcement authorities; and
- d. It is common for individuals who use fraudulently obtained identification documents to retain those documents for substantial periods of time so that they can continue to use the fraudulently obtained identities.

20. All agents participating in the search of the premises described in Attachment A will be informed of the full name represented by the initials that appear in Attachment B.

### **Conclusion**

21. Based on the foregoing, I have probable cause to believe that, on or about February 18, 2016, MANUEL MARIA GERMAN FAMILIA (1) falsely represented, with intent to deceive and for any purpose, a number to be the SSN assigned by the Commissioner of Social Security to him, when in fact such number is not the SSN assigned by the Commissioner of Social Security to him, in violation of 42 U.S.C. § 408(a)(7)(B); and (2) knowingly transferred, possessed and used,

during and in relation to any felony violation enumerated in 18 U.S.C. 1028A(c), and without lawful authority, a means of identification of another person in violation of 18 U.S.C. § 1028A.

20. Based on the forgoing, I have probable cause to believe that evidence, fruits, and instrumentalities of the Target Offenses, as further described in Attachment B, will be found during a search of the Target Location, described in Attachment A.


Signed under the pains and penalties of perjury.



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TIMOTHY TABER  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 this 3 day of February 2021.



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HONORABLE JENNIFER C. BOAL  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MASSACHUSETTS

